

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND
3 MARYLAND SHALL ISSUE, INC.,
4 et al.,
5 Plaintiffs,
6 vs. Civil Action No.:
7 ANNE ARUNDEL COUNTY, MD, 1:22-cv-00865-SAG
8 Defendant.

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11 The 30(b)(6) deposition of WILLIAM QUICK
12 was held on Thursday, September 8, 2022, commencing at
13 9:10 a.m., at the Law Offices of Anne Arundel County
14 Office of Law, 2660 Riva Road, 4th Floor, Annapolis,
15 Maryland, before Steven Poulakos, Notary Public.

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17
18
19 **EXHIBIT I**

20
21 REPORTED BY: Steven Poulakos, RPR

<p>Page 2</p> <p>1 APPEARANCES:</p> <p>2 ON BEHALF OF THE PLAINTIFFS:</p> <p>3 MARK PENNAK, ESQUIRE</p> <p>4 Maryland Shall Issue, Inc.</p> <p>5 9613 Harford Road</p> <p>6 Suite C#1015</p> <p>7 Baltimore, Maryland 21234</p> <p>8 Telephone: 301.873.3671</p> <p>9 Email: mpennak@mraylandshallissue.org</p> <p>10</p> <p>11 ON BEHALF OF THE DEFENDANT:</p> <p>12 JAMES E. MILLER, ESQUIRE</p> <p>13 NINA SUDARSAN, ESQUIRE</p> <p>14 Everytown Law</p> <p>15 450 Lexington Avenue</p> <p>16 New York, New York 10017</p> <p>17 Telephone: 646.324.8220</p> <p>18 Email: jedmiller@everytown.org</p> <p>19</p> <p>20 (Appearances continued on next page.)</p> <p>21</p>	<p>Page 4</p> <p>1 INDEX</p> <p>2 Deposition of WILLIAM QUICK</p> <p>3 September 8, 2022</p> <p>4 Examination by: Page</p> <p>5 Ms. Sudarsan 5</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 Exhibit No. Description Marked</p> <p>9 Exhibit 9 Notice of Rule 30(b)(6) Deposition 9</p> <p>10</p> <p>11 PREVIOUSLY MARKED EXHIBITS</p> <p>12 Exhibit 4 Youth Handgun Safety Act Notice 103</p> <p>13 pamphlet notice</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>
<p>Page 3</p> <p>1 APPEARANCES (Continued):</p> <p>2 ON BEHALF OF THE DEFENDANT:</p> <p>3 HAMILTON F. TYLER, ESQUIRE</p> <p>4 Anne Arundel County Office of Law</p> <p>5 Deputy County Attorney</p> <p>6 2660 Riva Road</p> <p>7 4th Floor</p> <p>8 Annapolis, Maryland 21401</p> <p>9 Telephone: 410.222.4208</p> <p>10 Email: htyler@aacounty.org</p> <p>11 And</p> <p>12 ON BEHALF OF THE DEFENDANTS:</p> <p>13 TAMAL A. BANTON, ESQUIRE</p> <p>14 Anne Arundel County Office of Law</p> <p>15 Senior Assistant County Attorney</p> <p>16 2660 Riva Road</p> <p>17 4th Floor</p> <p>18 Annapolis, Maryland 21401</p> <p>19 Telephone: 410.222.7888</p> <p>20 Email: tbanton@aacounty.org</p> <p>21</p>	<p>Page 5</p> <p>1 ---</p> <p>2 PROCEEDINGS</p> <p>3 ---</p> <p>4 Whereupon,</p> <p>5 WILLIAM QUICK,</p> <p>6 called as a witness, having been first duly sworn to</p> <p>7 tell the truth, the whole truth, and nothing but the</p> <p>8 truth, was examined and testified as follows:</p> <p>9 EXAMINATION BY MS. SUDARSAN</p> <p>10 Q Good morning.</p> <p>11 A Good morning.</p> <p>12 Q I am Nina Sudarsan and I am with Everytown</p> <p>13 Law. And I represent Anne Arundel County, the</p> <p>14 defendant in this litigation. I'm joined by a couple</p> <p>15 of my colleagues who I will let introduce themselves.</p> <p>16 MR. MILLER: Good Morning, Mr. Quick. My</p> <p>17 name is James Miller. I'm also a lawyer with Everytown</p> <p>18 Law representing Anne Arundel County.</p> <p>19 MR. BANTON: Good morning. Tamal Banton</p> <p>20 from Anne Arundel County Office of Law.</p> <p>21 THE WITNESS: Good morning.</p>

<p style="text-align: right;">Page 22</p> <p>1 Q What products does Cindy's Hot Shots sell?</p> <p>2 A Firearms, ammunition and firearms</p> <p>3 accessories.</p> <p>4 Q Anything else? Any other products?</p> <p>5 A Not for the most part.</p> <p>6 Q Do you sell gun safes?</p> <p>7 A Yes.</p> <p>8 Q Do you sell gun locks?</p> <p>9 A Yes.</p> <p>10 Q Do you sell lock boxes?</p> <p>11 A Yes.</p> <p>12 Q And any other products?</p> <p>13 A Yes.</p> <p>14 Q Besides the ones you've already listed,</p> <p>15 firearms, ammunition, accessories, gun safes?</p> <p>16 A Anything having to do with firearms.</p> <p>17 Q Do you sell sporting goods?</p> <p>18 A Define sporting goods.</p> <p>19 Q Do you sell fishing poles?</p> <p>20 A We do not.</p> <p>21 Q What sporting goods do you sell?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q How many firearms per month does Cindy's</p> <p>2 Hot Shots sell?</p> <p>3 A I'm not sure. I would have to look in the</p> <p>4 system.</p> <p>5 Q More than 10 firearms a month?</p> <p>6 A For sure.</p> <p>7 Q More than 100?</p> <p>8 A Between 10 and a hundred for sure.</p> <p>9 Q Between 10 and a hundred. Let's get a</p> <p>10 little closer. Do you think more than 50?</p> <p>11 A I don't know. I don't look at those</p> <p>12 numbers often.</p> <p>13 Q Do you have a sense for your annual sales?</p> <p>14 A Yes. Annually I'd say about 2,000.</p> <p>15 Q How many transactions per month involve the</p> <p>16 sale of ammunition but not a firearm?</p> <p>17 A Thousands.</p> <p>18 Q Per month?</p> <p>19 A Yes.</p> <p>20 MR. PENNAK: Thousands of transactions?</p> <p>21 THE WITNESS: Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 A For the most part, nothing.</p> <p>2 Q How many firearms per month do you sell at</p> <p>3 Cindy's Hot Shots on average?</p> <p>4 A It's hard to quantify.</p> <p>5 MR. PENNAK: Is the question directed at</p> <p>6 how many firearms he personally sells or how many</p> <p>7 firearms his shop sells?</p> <p>8 BY MS. SUDARSAN:</p> <p>9 Q All of my questions today -- as you've</p> <p>10 already agreed to, you are here representing Cindy's</p> <p>11 Hot Shots. So as you already agreed, your testimony is</p> <p>12 the testimony of Cindy's Hot Shots.</p> <p>13 A Right.</p> <p>14 Q When I say you, I'm referring to Cindy's</p> <p>15 Hot Shots.</p> <p>16 A Of course.</p> <p>17 Q If you are confused as to whether or not</p> <p>18 I'm asking you a question in your individual capacity</p> <p>19 or in the capacity of Cindy's Hot Shots, please let me</p> <p>20 know.</p> <p>21 A Of course.</p>	<p style="text-align: right;">Page 25</p> <p>1 BY MS. SUDARSAN:</p> <p>2 Q Thousands. Are we closer to 1,000 or</p> <p>3 closer to 10,000?</p> <p>4 A Closer to a thousand.</p> <p>5 Q One thousand?</p> <p>6 A Yes.</p> <p>7 Q Do you do any other type of business at</p> <p>8 Cindy's Hot Shots?</p> <p>9 A We do not.</p> <p>10 Q You don't offer training classes?</p> <p>11 A We do not. So we employ an outside company</p> <p>12 to do the training.</p> <p>13 Q So nobody -- no employees of Cindy's Hot</p> <p>14 Shots conduct the training classes offered at Cindy's</p> <p>15 Hot Shots?</p> <p>16 A No, not under Cindy's Hot Shots' license.</p> <p>17 Q Are they offered in your facilities in your</p> <p>18 building?</p> <p>19 A Not in the firing range, but in the</p> <p>20 training facility, yes.</p> <p>21 Q But you advertise training on your website?</p>

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<p>1 during this first time gun owner assistance?</p> <p>2 A We do not.</p> <p>3 Q Do you offer gun rentals at Cindy's Hot</p> <p>4 Shots?</p> <p>5 A We do.</p> <p>6 Q And that's under Cindy's Hot Shots, not --</p> <p>7 A Yes.</p> <p>8 Q Do you offer any other public education at</p> <p>9 Cindy's Hot Shots?</p> <p>10 A We do not.</p> <p>11 Q And do you do any public advocacy?</p> <p>12 A I don't think so.</p> <p>13 Q Do you do any lobbying?</p> <p>14 A No.</p> <p>15 Q And does the ordinance affect your ability</p> <p>16 to offer this first time gun owner training in any way?</p> <p>17 A It could.</p> <p>18 Q How?</p> <p>19 A By violating everybody's First Amendment</p> <p>20 right.</p> <p>21 Q What does that mean?</p>	<p>1 assistance?</p> <p>2 A I don't know.</p> <p>3 Q More than once?</p> <p>4 A I'm not sure.</p> <p>5 Q Can you walk me through a specific instance</p> <p>6 with a customer where the ordinance affected your</p> <p>7 ability to talk them through or show them the first</p> <p>8 time gun owner assistance that you provide?</p> <p>9 MR. PENNAK: Are you talking about the</p> <p>10 short period of time in which the pamphlets were</p> <p>11 available and prior to being distributed under the</p> <p>12 county's ordinance until they were removed? I'm not</p> <p>13 sure about the timeframe here. Is it a hypothetical</p> <p>14 question or is it -- relates to a particular time?</p> <p>15 MS. SUDARSAN: I asked for specific</p> <p>16 instances. So that's not a hypothetical.</p> <p>17 MR. PENNAK: Okay.</p> <p>18 MS. SUDARSAN: And I'm asking for any time</p> <p>19 since the ordinance has been in effect.</p> <p>20 THE WITNESS: Being that it isn't in effect</p> <p>21 right now and it was only in effect for a short period</p>
Page 31	Page 33
<p>1 A So a customer coming in is going to have to</p> <p>2 look at the pamphlet. If they don't agree with the</p> <p>3 pamphlet and it's being forced on every single range in</p> <p>4 Maryland or Anne Arundel County at least, they have no</p> <p>5 choice but to be exposed to it.</p> <p>6 Q How does that exposure affect your ability</p> <p>7 to talk them through the first time gun owner</p> <p>8 assistance that you described earlier?</p> <p>9 A It could be distracting.</p> <p>10 Q How so?</p> <p>11 A If it's something that somebody doesn't</p> <p>12 want to partake in and they're being forced to partake</p> <p>13 in it, that could be distracting.</p> <p>14 Q Has the ordinance affected your ability to</p> <p>15 offer this first time gun owner assistance?</p> <p>16 MR. PENNAK: Asked and answered.</p> <p>17 BY MS. SUDARSAN:</p> <p>18 Q You can answer.</p> <p>19 A I believe I did.</p> <p>20 Q How many times has the ordinance affected</p> <p>21 your ability to offer this first time gun owner</p>	<p>1 of time, it has not.</p> <p>2 BY MS. SUDARSAN:</p> <p>3 Q So you cannot identify any instances</p> <p>4 specifically where you were unable to provide the first</p> <p>5 time gun owner assistance to a customer because of the</p> <p>6 ordinance?</p> <p>7 MR. PENNAK: Asked and answered.</p> <p>8 THE WITNESS: I cannot.</p> <p>9 BY MS. SUDARSAN:</p> <p>10 Q I couldn't hear your answer.</p> <p>11 A I did answer that.</p> <p>12 Q What was your answer?</p> <p>13 A That -- can you repeat the question?</p> <p>14 Q So you cannot identify a single instance</p> <p>15 where the ordinance affected your ability to offer the</p> <p>16 first time gun owner assistance to a customer?</p> <p>17 A I cannot.</p> <p>18 Q And you testified that it would be</p> <p>19 distracting to a customer. What did you mean by that?</p> <p>20 MR. PENNAK: Asked and answered.</p> <p>21</p>

<p style="text-align: right;">Page 34</p> <p>1 BY MS. SUDARSAN:</p> <p>2 Q You can answer.</p> <p>3 A I believe I did.</p> <p>4 MR. BANTON: You have to answer the</p> <p>5 question.</p> <p>6 MR. PENNAK: Mr. Banton, she's conducting</p> <p>7 this deposition. You don't get to tag team. You</p> <p>8 cannot answer this question. You cannot participate on</p> <p>9 this when she's conducting the deposition. That tag</p> <p>10 teaming, it's improper and I'm going to object to it.</p> <p>11 MR. BANTON: Can we go off the record?</p> <p>12 MR. PENNAK: No, I'm not going off the</p> <p>13 record.</p> <p>14 MR. BANTON: I'll stay on the record then.</p> <p>15 He's been instructed to answer the question. You're</p> <p>16 coaching him and then saying he's already answered the</p> <p>17 question. He still has to answer the question.</p> <p>18 MR. PENNAK: You're not conducting the</p> <p>19 deposition. You don't get to participate unless you --</p> <p>20 MR. BANTON: I'll go talk to her after</p> <p>21 every question.</p>	<p style="text-align: right;">Page 36</p> <p>1 uncomfortable?</p> <p>2 A They could be.</p> <p>3 Q How so?</p> <p>4 A Being forced to view something that they</p> <p>5 don't want to view.</p> <p>6 Q How do you know that your customers might</p> <p>7 be distracted or could be distracted by the pamphlets?</p> <p>8 A I don't know. They could be, though. I</p> <p>9 just -- I don't want to expose my customers to that.</p> <p>10 Q Have you spoken to any customers about the</p> <p>11 ordinance?</p> <p>12 A I have not.</p> <p>13 Q Have you spoken to any customers about the</p> <p>14 pamphlets?</p> <p>15 A I have not.</p> <p>16 Q So when you say they could be distracted,</p> <p>17 you are guessing?</p> <p>18 MR. PENNAK: Argumentative.</p> <p>19 THE WITNESS: I might -- it's an educated</p> <p>20 guess.</p> <p>21 BY MS. SUDARSAN:</p>
<p style="text-align: right;">Page 35</p> <p>1 MR. PENNAK: You can talk to your counsel</p> <p>2 if you want.</p> <p>3 MR. BANTON: We'll do that.</p> <p>4 MR. PENNAK: But you can't direct my</p> <p>5 witness to answer the questions. That's tag teaming.</p> <p>6 MR. BANTON: We're good. I'll take care of</p> <p>7 it. I've done a thousand depositions. However you</p> <p>8 want to handle it, you can handle it.</p> <p>9 MR. PENNAK: Talk to your counsel. She's</p> <p>10 conducting the deposition. She is the only one</p> <p>11 conducting it. Otherwise it's completely improper for</p> <p>12 you to address.</p> <p>13 MR. BANTON: You're coaching the witness.</p> <p>14 MR. PENNAK: I'm not coaching the witness.</p> <p>15 MR. BANTON: Yes, you are.</p> <p>16 BY MS. SUDARSAN:</p> <p>17 Q I believe your testimony was the pamphlets</p> <p>18 could be distracting because a customer I believe you</p> <p>19 said would disagree with them?</p> <p>20 A Yes.</p> <p>21 Q And did you say they would be</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Educated based on what?</p> <p>2 A I deal with customers constantly. I know</p> <p>3 what ticks customers off and that more than likely</p> <p>4 would.</p> <p>5 Q What kinds of things tick off your</p> <p>6 customers?</p> <p>7 A There's a lot of things. Anything having</p> <p>8 to do with stripping the constitutional freedoms for</p> <p>9 sure.</p> <p>10 Q What constitutional freedoms are you</p> <p>11 referring to?</p> <p>12 A Any, any and all.</p> <p>13 Q Which constitutional freedoms have you</p> <p>14 discussed with your customers?</p> <p>15 A Most constitutional freedoms.</p> <p>16 Q Have you discussed the First Amendment with</p> <p>17 your customers?</p> <p>18 A I have.</p> <p>19 Q In what capacity?</p> <p>20 A That's a hard one. I can't remember back</p> <p>21 to specific conversations, but I know I have.</p>

<p style="text-align: right;">Page 42</p> <p>1 A So in the pamphlet --</p> <p>2 (Reviewing document.)</p> <p>3 More than likely just the fact that this is</p> <p>4 being forced on the firearms retailers and no one else.</p> <p>5 It infers that firearms -- firearms are an issue in</p> <p>6 relation to suicide.</p> <p>7 Q When you say more than likely, do you mean</p> <p>8 more than likely the reason your customers will be</p> <p>9 ticked off?</p> <p>10 A Yes.</p> <p>11 Q How do you know that?</p> <p>12 A I know my customers.</p> <p>13 Q Is it possible that some of your customers</p> <p>14 who see the pamphlets will agree with the content?</p> <p>15 MR. PENNAK: Objection, calls for</p> <p>16 speculation.</p> <p>17 THE WITNESS: I don't know.</p> <p>18 BY MS. SUDARSAN:</p> <p>19 Q But it's possible that some of your</p> <p>20 customers will agree with the pamphlet?</p> <p>21 A It could be.</p>	<p style="text-align: right;">Page 44</p> <p>1 will agree with the pamphlet that was authored by the</p> <p>2 National Shooting Sports Foundation?</p> <p>3 MR. PENNAK: Same objection.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MS. SUDARSAN:</p> <p>6 Q You don't know because you haven't spoken</p> <p>7 to any of your customers about the ordinance or the</p> <p>8 pamphlets?</p> <p>9 A Yes.</p> <p>10 Q So everything you are saying here today</p> <p>11 about what your customers think and feel is a guess?</p> <p>12 A An educated guess, yes.</p> <p>13 Q Is Cindy's Hot Shots a member of MSI?</p> <p>14 A Yes.</p> <p>15 Q Is Cindy's Hot Shots a corporate member of</p> <p>16 MSI?</p> <p>17 A Yes.</p> <p>18 Q How long has Cindy's Hot Shots been a</p> <p>19 member of MSI?</p> <p>20 A I want to say at least a year.</p> <p>21 Q And why did Cindy's Hot Shots become a</p>
<p style="text-align: right;">Page 43</p> <p>1 MR. PENNAK: Same objection.</p> <p>2 BY MS. SUDARSAN:</p> <p>3 Q You are guessing that none of your</p> <p>4 customers will agree with anything in this pamphlet?</p> <p>5 A Yes.</p> <p>6 Q And you see on the cover on this pamphlet</p> <p>7 that one of the authors of the pamphlet marked as</p> <p>8 Exhibit 5 is the National Shooting Sports Foundation?</p> <p>9 A Yes.</p> <p>10 Q Is it possible that some of your customers</p> <p>11 agree with the National Shooting Sports Foundation?</p> <p>12 MR. PENNAK: Objection, calls for</p> <p>13 speculation.</p> <p>14 MS. SUDARSAN: Counsel, can you please let</p> <p>15 me finish my questions before you lodge your objection?</p> <p>16 MR. PENNAK: I apologize. I thought you</p> <p>17 were finished.</p> <p>18 MS. SUDARSAN: I was mid sentence.</p> <p>19 THE WITNESS: Can you repeat the question?</p> <p>20 BY MS. SUDARSAN:</p> <p>21 Q Is it possible that some of your customers</p>	<p style="text-align: right;">Page 45</p> <p>1 corporate member of MSI?</p> <p>2 A Because we believe in their mission.</p> <p>3 Q What is the mission of MSI?</p> <p>4 A To fight for everyone's Second Amendment</p> <p>5 rights in Maryland.</p> <p>6 Q And what does being a corporate member of</p> <p>7 MSI entail for Cindy's Hot Shots?</p> <p>8 A I don't know. There is a fee.</p> <p>9 Q Do you remember what the fee was?</p> <p>10 A I do not.</p> <p>11 Q Do you attend meetings?</p> <p>12 A I have not.</p> <p>13 Q Are there meetings? Does MSI have meetings</p> <p>14 for its members?</p> <p>15 A I believe so.</p> <p>16 Q Has anyone from Cindy's Hot Shots attended</p> <p>17 any of those MSI meetings?</p> <p>18 A No.</p> <p>19 Q Were you a member of MSI before this</p> <p>20 litigation started?</p> <p>21 A I was.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q Do you receive information from MSI?</p> <p>2 A Yes.</p> <p>3 Q What kind of information?</p> <p>4 A Updates on suits going on in Maryland,</p> <p>5 updates on laws in Maryland.</p> <p>6 Q Anything else?</p> <p>7 A That's it for the most part.</p> <p>8 Q Do they send this by email?</p> <p>9 A Email, mail, both.</p> <p>10 Q As a corporate member, did you have any say</p> <p>11 in whether or not MSI pursued this litigation?</p> <p>12 A I don't believe so.</p> <p>13 Q Are you an individual member of MSI?</p> <p>14 A I am.</p> <p>15 Q How long have you been an individual</p> <p>16 member?</p> <p>17 A At least three years.</p> <p>18 Q Why did you become an individual member of</p> <p>19 MSI?</p> <p>20 A Because I believe in their mission.</p> <p>21 Q And that mission is to protect the Second</p>	<p style="text-align: right;">Page 48</p> <p>1 Q What was your reaction to the ordinance</p> <p>2 when you first heard about -- when you first read it?</p> <p>3 A I was in disagreeance with it.</p> <p>4 Q What do you disagree with in the ordinance?</p> <p>5 A Being forced to do it, being forced to</p> <p>6 distribute.</p> <p>7 Q Being forced to distribute what?</p> <p>8 A The pamphlets.</p> <p>9 Q Why do you disagree with the distribution</p> <p>10 of the pamphlets?</p> <p>11 A Because it violates my First Amendment</p> <p>12 rights.</p> <p>13 Q How so?</p> <p>14 MR. PENNAK: Calls for a legal conclusion</p> <p>15 by the witness. Objection.</p> <p>16 THE WITNESS: I'm being forced to</p> <p>17 distribute it and I may not agree with it -- I don't</p> <p>18 agree with it and I'm being forced to.</p> <p>19 BY MS. SUDARSAN:</p> <p>20 Q When you first heard about the bill, was</p> <p>21 this before it went into effect?</p>
<p style="text-align: right;">Page 47</p> <p>1 Amendment rights of everyone in Maryland?</p> <p>2 A Yes.</p> <p>3 Q As an individual member, do you attend MSI</p> <p>4 meetings?</p> <p>5 A I do not.</p> <p>6 Q Do you receive information from MSI in your</p> <p>7 capacity as an individual member?</p> <p>8 A I do.</p> <p>9 Q Is that information about bills?</p> <p>10 A Yes.</p> <p>11 Q And about other lawsuits?</p> <p>12 A Yes.</p> <p>13 Q We've discussed the ordinance at issue in</p> <p>14 this litigation and you are familiar with Bill 108-21,</p> <p>15 right?</p> <p>16 A I am.</p> <p>17 Q And you've read it before?</p> <p>18 A I have.</p> <p>19 Q You I believe testified you learned about</p> <p>20 the bill from your dad?</p> <p>21 A I believe so, yes.</p>	<p style="text-align: right;">Page 49</p> <p>1 A Yes.</p> <p>2 Q And did anyone from Cindy's Hot Shots</p> <p>3 attend a public hearing on the bill?</p> <p>4 A No -- yes.</p> <p>5 Q Yes?</p> <p>6 A Yes.</p> <p>7 Q Who attended a public hearing?</p> <p>8 A Tom.</p> <p>9 Q Tom is Tom Quick, your dad?</p> <p>10 A Yes.</p> <p>11 Q How many hearings did your dad, Tom Quick</p> <p>12 attend?</p> <p>13 A Just one.</p> <p>14 Q Do you know when that was?</p> <p>15 A I don't.</p> <p>16 Q Did Tom Quick speak at the public hearing?</p> <p>17 A I don't know.</p> <p>18 Q Did you talk to Tom Quick about the hearing</p> <p>19 before he attended?</p> <p>20 A No.</p> <p>21 Q Did you talk to him after?</p>

<p style="text-align: right;">Page 54</p> <p>1 Q Do you know if the pamphlets had already</p> <p>2 been developed when the bill was voted on?</p> <p>3 A I have no idea.</p> <p>4 Q And you thought the ordinance wouldn't pass</p> <p>5 and that's why you didn't attend the public hearing or</p> <p>6 reach out to the county?</p> <p>7 MR. PENNAK: Asked and answered.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. SUDARSAN:</p> <p>10 Q Once you found out the ordinance had</p> <p>11 passed, why didn't you reach out about giving Cindy's</p> <p>12 Hot Shots input on the literature?</p> <p>13 A Because I didn't agree with the bill.</p> <p>14 Q Did you not think it was important to give</p> <p>15 Cindy's Hot Shots' input on the literature that you</p> <p>16 would be displaying and distributing at your store?</p> <p>17 A No, because I wasn't going to agree with it</p> <p>18 anyway.</p> <p>19 Q There would have been no content that you</p> <p>20 would have agreed to post and distribute in your store</p> <p>21 under this ordinance?</p>	<p style="text-align: right;">Page 56</p> <p>1 more at risk for suicide than others?</p> <p>2 A Environmental factors down at the bottom,</p> <p>3 access to lethal means including firearms.</p> <p>4 Q You are pointing to the second column?</p> <p>5 A Yes.</p> <p>6 Q Titled environmental factors?</p> <p>7 A Yes.</p> <p>8 Q And the last line that -- and you read</p> <p>9 access to lethal means including firearms?</p> <p>10 A Yes.</p> <p>11 Q What do you disagree with in that</p> <p>12 statement?</p> <p>13 A I don't agree with that statement.</p> <p>14 Q What don't you agree with?</p> <p>15 MR. PENNAK: Asked and answered.</p> <p>16 THE WITNESS: I don't agree with the</p> <p>17 statement as a whole.</p> <p>18 BY MS. SUDARSAN:</p> <p>19 Q What is the basis for your disagreement</p> <p>20 with the statement access to lethal means including</p> <p>21 firearms and drugs?</p>
<p style="text-align: right;">Page 55</p> <p>1 A More than likely not.</p> <p>2 Q We were previously looking at the document</p> <p>3 marked Exhibit 5. Do you have that in front of you?</p> <p>4 A Yes.</p> <p>5 Q If you can just look at that and you</p> <p>6 previously said you have read this pamphlet before?</p> <p>7 A I have.</p> <p>8 Q We started to talk about this earlier,</p> <p>9 but -- and if you need to read the pamphlet again</p> <p>10 today, that's fine, but what do you disagree with --</p> <p>11 what do you disagree with that is written in this</p> <p>12 pamphlet?</p> <p>13 A The pamphlet infers that there's a higher</p> <p>14 risk of suicide with firearms ownership.</p> <p>15 Q Where in the pamphlet --</p> <p>16 A In its entirety.</p> <p>17 Q Every word of this pamphlet infers that the</p> <p>18 rate of suicide is higher with a firearm?</p> <p>19 A Specifically in this section.</p> <p>20 Q For the record, you are showing me I think</p> <p>21 page 2 of this pamphlet that is titled some people are</p>	<p style="text-align: right;">Page 57</p> <p>1 A I don't -- I don't believe that that leads</p> <p>2 to a higher risk of suicide.</p> <p>3 Q On this same page -- and maybe you read</p> <p>4 this before and I missed it. I apologize. The</p> <p>5 document says, risk factors are characteristics or</p> <p>6 conditions that increase the chance that a person may</p> <p>7 try to take their life.</p> <p>8 A Yes.</p> <p>9 Q And you disagree that access to lethal</p> <p>10 means including firearms and drugs may increase the</p> <p>11 chance that a person tries to take their life?</p> <p>12 A Yes.</p> <p>13 Q What is your basis for disagreeing with</p> <p>14 that?</p> <p>15 A I don't believe it. I've been around</p> <p>16 firearms my whole life. I know tons of people that</p> <p>17 have. I believe if you're going to do something as</p> <p>18 horrible as suicide, you're planning on doing it,</p> <p>19 you're going to do it anyway whether or not you have</p> <p>20 access to a firearm.</p> <p>21 Q Does this document say that firearms are</p>

<p style="text-align: right;">Page 58</p> <p>1 the only way that someone may try to take their life?</p> <p>2 MR. PENNAK: Objection. The document</p> <p>3 speaks for itself.</p> <p>4 THE WITNESS: It does not.</p> <p>5 BY MS. SUDARSAN:</p> <p>6 Q So your disagreement that if someone is</p> <p>7 suicidal, they will find a way to take their life isn't</p> <p>8 disputed by this document?</p> <p>9 MR. PENNAK: Objection, mischaracterizes</p> <p>10 the document.</p> <p>11 THE WITNESS: I don't know. I'm not sure.</p> <p>12 BY MS. SUDARSAN:</p> <p>13 Q So you just said your disagreement with the</p> <p>14 statement that access to lethal means including</p> <p>15 firearms and drugs increases the chance that a person</p> <p>16 may try to take their life is that if someone wanted to</p> <p>17 take their life, they would find a different way. I am</p> <p>18 asking is that statement -- is your understanding that</p> <p>19 that statement is disputed by this pamphlet?</p> <p>20 A No. I think it demonizes firearms.</p> <p>21 Q How so?</p>	<p style="text-align: right;">Page 60</p> <p>1 suicide in Maryland?</p> <p>2 A I have not.</p> <p>3 Q Have you studied the rate of firearm</p> <p>4 suicide in the United States?</p> <p>5 A No.</p> <p>6 Q Have you studied the global rate of firearm</p> <p>7 suicide?</p> <p>8 A No.</p> <p>9 Q Do you agree that firearms can be lethal?</p> <p>10 A Of course.</p> <p>11 Q Do you agree that sometimes people use</p> <p>12 firearms to try to kill themselves?</p> <p>13 A Yes.</p> <p>14 Q And you agree that sometimes people use</p> <p>15 firearms to kill themselves?</p> <p>16 A Yes.</p> <p>17 Q Why do you think someone would use a</p> <p>18 firearm to try to kill themselves?</p> <p>19 A I don't know.</p> <p>20 Q Do you think it's because firearms are</p> <p>21 lethal?</p>
<p style="text-align: right;">Page 59</p> <p>1 A I don't know. It's says access to lethal</p> <p>2 means including firearms and drugs increase risk</p> <p>3 factors or a chance the person may commit suicide.</p> <p>4 Q Do you think that is a factually inaccurate</p> <p>5 statement that access to lethal means including</p> <p>6 firearms and drugs increase the chance that a person</p> <p>7 may try to take their life?</p> <p>8 A I do.</p> <p>9 Q What is your basis for disagreeing with</p> <p>10 that as a factual matter?</p> <p>11 A I just don't agree with it.</p> <p>12 Q You said earlier you've been around</p> <p>13 firearms all your life. Is your disagreement based on</p> <p>14 your relationship with firearms?</p> <p>15 A Yes.</p> <p>16 Q Is it based on anything else?</p> <p>17 A My experiences throughout life.</p> <p>18 Q Have you studied the rate of firearm</p> <p>19 suicide in Anne Arundel County?</p> <p>20 A I have not.</p> <p>21 Q Have you studied the rate of firearm</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. PENNAK: Asked and answered.</p> <p>2 THE WITNESS: I don't know.</p> <p>3 BY MS. SUDARSAN:</p> <p>4 Q Do you think that if someone wanted to try</p> <p>5 to take their own life, they may use an unlocked</p> <p>6 firearm that they found?</p> <p>7 MR. PENNAK: Calls for speculation on the</p> <p>8 part of the witness.</p> <p>9 THE WITNESS: Possibly.</p> <p>10 BY MS. SUDARSAN:</p> <p>11 Q If someone wanted to take their life, do</p> <p>12 you think they would be more likely to try if there</p> <p>13 were an unlocked firearm nearby?</p> <p>14 MR. PENNAK: Calls for speculation on the</p> <p>15 part of the witness.</p> <p>16 THE WITNESS: I don't think so.</p> <p>17 BY MS. SUDARSAN:</p> <p>18 Q You don't think so?</p> <p>19 A I don't think so.</p> <p>20 Q Do you agree that one way to prevent</p> <p>21 suicide would be to safely secure a firearm from</p>

<p style="text-align: right;">Page 66</p> <p>1 A Can you repeat the question?</p> <p>2 Q So you agree that the information in this</p> <p>3 pamphlet regarding securing firearms could be helpful</p> <p>4 information to provide to a firearm owner who is</p> <p>5 worried that someone in their family or household may</p> <p>6 be suicidal?</p> <p>7 MR. PENNAK: Same objection.</p> <p>8 THE WITNESS: I feel like there's many</p> <p>9 other ways to get that information.</p> <p>10 BY MS. SUDARSAN:</p> <p>11 Q But is this one way of getting that</p> <p>12 information to firearm owners?</p> <p>13 A I guess.</p> <p>14 Q Would you be happy to learn that one of</p> <p>15 your customers was helped by the information in this</p> <p>16 pamphlet?</p> <p>17 MR. PENNAK: Calls for a hypothetical.</p> <p>18 Never mind.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MS. SUDARSAN:</p> <p>21 Q So you agree that firearms are lethal and</p>	<p style="text-align: right;">Page 68</p> <p>1 Q What don't you agree with in this pamphlet?</p> <p>2 A I don't agree with the whole thing. I</p> <p>3 don't agree with it.</p> <p>4 Q Okay. Maybe we can go through it</p> <p>5 line-by-line and you can tell me what you disagree</p> <p>6 with. The first line, do you have unresolved</p> <p>7 conflicts.</p> <p>8 A Um-hmm.</p> <p>9 Q What do you disagree with?</p> <p>10 A I disagree that -- essentially this is</p> <p>11 saying are you trying to -- I just don't agree with it.</p> <p>12 I just don't.</p> <p>13 Q So you cannot articulate --</p> <p>14 A No.</p> <p>15 Q -- anything written on this pamphlet that</p> <p>16 you find objectionable?</p> <p>17 A No.</p> <p>18 Q So what is the basis for your disagreement?</p> <p>19 A I just don't agree with it.</p> <p>20 Q You don't disagree with anything that is</p> <p>21 written here is what you just testified, but you --</p>
<p style="text-align: right;">Page 67</p> <p>1 you agree that a gun owner who is worried that someone</p> <p>2 who is suicidal may try to access their firearm should</p> <p>3 ensure that the firearm is locked and secured, right?</p> <p>4 A Yes.</p> <p>5 Q Now I'm going to show you what -- now I'm</p> <p>6 going to show you this one pager that says at the top</p> <p>7 do you have unresolved conflicts. It's included in the</p> <p>8 document marked Exhibit 5.</p> <p>9 A Yes.</p> <p>10 Q Do you see that?</p> <p>11 A Yes.</p> <p>12 Q Have you seen this pamphlet before?</p> <p>13 A I have.</p> <p>14 Q Was this one of the two pamphlets required</p> <p>15 under the ordinance?</p> <p>16 A Yes.</p> <p>17 Q And you've read this before you said?</p> <p>18 A Yes.</p> <p>19 Q Do you agree with the content of this</p> <p>20 pamphlet?</p> <p>21 A I do not.</p>	<p style="text-align: right;">Page 69</p> <p>1 MR. PENNAK: Mischaracterizes the witness's</p> <p>2 testimony. Object.</p> <p>3 THE WITNESS: I don't agree with it.</p> <p>4 BY MS. SUDARSAN:</p> <p>5 Q I just asked you cannot articulate anything</p> <p>6 on this pamphlet that you disagree with and you said,</p> <p>7 and we can have the court reporter read it back, I</p> <p>8 think you said I do not?</p> <p>9 A I can't articulate it. I don't agree with</p> <p>10 it, though.</p> <p>11 Q Why don't you talk me through what you</p> <p>12 don't agree with?</p> <p>13 MR. PENNAK: Is there a question pending?</p> <p>14 I mean, you have to ask a question. Talk it out is not</p> <p>15 a question.</p> <p>16 BY MS. SUDARSAN:</p> <p>17 Q The statement conflict resolution is a</p> <p>18 process to help you find the best way to resolve</p> <p>19 conflicts and disagreements peacefully. Do you agree</p> <p>20 or disagree with that statement?</p> <p>21 MR. PENNAK: Asked and answered.</p>

<p style="text-align: right;">Page 78</p> <p>1 BY MS. SUDARSAN:</p> <p>2 Q You have no reason to think that the</p> <p>3 veterans crisis line wouldn't be a good resource for</p> <p>4 someone who is experiencing conflict to call?</p> <p>5 A I don't know. I'm not familiar with it.</p> <p>6 Q So you have no basis to disagree with the</p> <p>7 veterans crisis line as a resource for people who are</p> <p>8 in conflict?</p> <p>9 A Correct.</p> <p>10 Q So you have not identified anything listed</p> <p>11 or said or stated on this pamphlet that you disagree</p> <p>12 with?</p> <p>13 MR. PENNAK: Argumentative.</p> <p>14 THE WITNESS: No.</p> <p>15 BY MS. SUDARSAN:</p> <p>16 Q Are firearms mentioned in this pamphlet?</p> <p>17 A They are not.</p> <p>18 Q Do you agree that firearms are sometimes</p> <p>19 used in conflict?</p> <p>20 A Yes.</p> <p>21 Q People sometimes use guns to intimidate</p>	<p style="text-align: right;">Page 80</p> <p>1 MR. PENNAK: Objection. Document speaks</p> <p>2 for itself.</p> <p>3 THE WITNESS: It does.</p> <p>4 BY MS. SUDARSAN:</p> <p>5 Q Where?</p> <p>6 A It's a part of the firearm suicide</p> <p>7 prevention packet.</p> <p>8 Q And these two pamphlets together, how do</p> <p>9 you read them?</p> <p>10 A Can you elaborate?</p> <p>11 Q You said it's included with this pamphlet?</p> <p>12 A Right.</p> <p>13 Q And so the message that firearms and</p> <p>14 ammunition are causally related to the illegal use of</p> <p>15 firearms and ammunition and conflict resolution is</p> <p>16 something you derive from these two pamphlets being</p> <p>17 together?</p> <p>18 A Yes.</p> <p>19 Q Can you describe that? Can you explain</p> <p>20 that relationship?</p> <p>21 A No. It speaks for itself.</p>
<p style="text-align: right;">Page 79</p> <p>1 others?</p> <p>2 A Among other things, yes.</p> <p>3 Q People sometimes use guns to injure others?</p> <p>4 A Yes.</p> <p>5 Q People sometimes use guns to kill others?</p> <p>6 A Yes.</p> <p>7 Q In your Interrogatory responses which you</p> <p>8 referenced earlier, you objected that this document</p> <p>9 sends the message that possession of firearms and</p> <p>10 ammunition is causally related to the illegal use of</p> <p>11 firearms and ammunition in conflict resolution. In our</p> <p>12 previous discussion of this pamphlet, you did not</p> <p>13 mention that objection. Would you like to correct your</p> <p>14 testimony?</p> <p>15 A Yes.</p> <p>16 Q And where in the document is that message</p> <p>17 communicated?</p> <p>18 A The fact that it's present with the</p> <p>19 firearms and suicide prevention packet.</p> <p>20 Q But that is not communicated in this</p> <p>21 document, right?</p>	<p style="text-align: right;">Page 81</p> <p>1 Q Do either of these pamphlets say anything</p> <p>2 about gun owners using their guns in conflict?</p> <p>3 A I don't believe so.</p> <p>4 Q Do you think that trying to prevent someone</p> <p>5 from taking their own life is important?</p> <p>6 A Yes.</p> <p>7 Q And the purpose of the pamphlet titled</p> <p>8 firearms and suicide prevention is to prevent suicide,</p> <p>9 right?</p> <p>10 MR. PENNAK: Objection, calls for</p> <p>11 speculation on the part of the witness.</p> <p>12 THE WITNESS: I don't know.</p> <p>13 BY MS. SUDARSAN:</p> <p>14 Q Does this pamphlet provide resources to</p> <p>15 individuals who know someone who is feeling suicidal?</p> <p>16 MR. PENNAK: The document speaks for</p> <p>17 itself.</p> <p>18 THE WITNESS: I guess.</p> <p>19 BY MS. SUDARSAN:</p> <p>20 Q It provides information on suicide warnings</p> <p>21 to look for?</p>

<p style="text-align: right;">Page 86</p> <p>1 Q People don't talk about that, but do some</p> <p>2 people go to gun stores to buy guns that they plan to</p> <p>3 use to intimidate or to injure someone else?</p> <p>4 MR. PENNAK: Calls for speculation.</p> <p>5 THE WITNESS: I don't know. I don't know.</p> <p>6 BY MS. SUDARSAN:</p> <p>7 Q Have any guns sold by Cindy's Hot Shots</p> <p>8 been recovered in crime?</p> <p>9 A Yes.</p> <p>10 Q And you don't want people to commit crimes</p> <p>11 with the firearms you sell, right?</p> <p>12 A Absolutely not.</p> <p>13 MS. SUDARSAN: We can take a little break.</p> <p>14 We can go off the record.</p> <p>15 (There was a brief recess taken.)</p> <p>16 MR. PENNAK: Before we resume, I would like</p> <p>17 to put on the record that my client has received</p> <p>18 repeated inquiries about work. He needs to return to</p> <p>19 work as soon as possible. How much longer do you</p> <p>20 intend to take this deposition?</p> <p>21 MS. SUDARSAN: I would say at least an</p>	<p style="text-align: right;">Page 88</p> <p>1 A Yes.</p> <p>2 Q Do you understand the ordinance to require</p> <p>3 you to do anything else?</p> <p>4 A No.</p> <p>5 Q You don't have to say anything to your</p> <p>6 customers about the pamphlets, right, under the</p> <p>7 ordinance?</p> <p>8 A No.</p> <p>9 Q You don't understand the ordinance to</p> <p>10 require you to say anything at all?</p> <p>11 A Yes.</p> <p>12 MR. PENNAK: Objection.</p> <p>13 BY MS. SUDARSAN:</p> <p>14 Q You can answer.</p> <p>15 A Yes.</p> <p>16 Q You don't have to endorse the pamphlets,</p> <p>17 right?</p> <p>18 A Correct.</p> <p>19 Q And your customers don't have to read the</p> <p>20 pamphlets, right?</p> <p>21 A Correct.</p>
<p style="text-align: right;">Page 87</p> <p>1 hour.</p> <p>2 MR. PENNAK: Okay with it?</p> <p>3 THE WITNESS: Yes.</p> <p>4 MR. PENNAK: Okay.</p> <p>5 BY MS. SUDARSAN:</p> <p>6 Q Mr. Quick, we are back on the record. You</p> <p>7 understand that the rules we went over this morning</p> <p>8 still apply?</p> <p>9 A Yes.</p> <p>10 Q And you understand that you are still under</p> <p>11 oath, correct?</p> <p>12 A Yes.</p> <p>13 Q Thank you.</p> <p>14 So I think earlier you -- strike that.</p> <p>15 Your understanding is that ordinance</p> <p>16 requires you to give the pamphlets only to purchasers</p> <p>17 of firearms and ammunition under the ordinance, right?</p> <p>18 A Yes.</p> <p>19 Q And your understanding is that the</p> <p>20 ordinance requires you to make the pamphlets visible</p> <p>21 and available in your store, right?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q Your customers can throw them in the trash,</p> <p>2 right?</p> <p>3 A Yes.</p> <p>4 Q So the ordinance doesn't require you to say</p> <p>5 anything?</p> <p>6 MR. PENNAK: Calls for a legal conclusion.</p> <p>7 THE WITNESS: It could be seen that we</p> <p>8 endorse them because we have to hand them out.</p> <p>9 BY MS. SUDARSAN:</p> <p>10 Q But you don't understand the ordinance to</p> <p>11 require you to say that you endorse the pamphlets,</p> <p>12 right?</p> <p>13 A It does not.</p> <p>14 Q Is there a speech that you make to a</p> <p>15 customer when you are giving them firearms or</p> <p>16 ammunition that they have purchased that you will be</p> <p>17 unable to say when the pamphlets are on display in your</p> <p>18 store?</p> <p>19 A No.</p> <p>20 Q Are there, you know, things that you say to</p> <p>21 a customer when you are giving them the firearms or</p>

<p style="text-align: right;">Page 90</p> <p>1 ammunition they purchased that you will be unable to</p> <p>2 say because you've distributed the two pamphlets?</p> <p>3 A No.</p> <p>4 Q So you will be able to continue to say what</p> <p>5 you want about any topic that you wish to speak about</p> <p>6 with your customers once the pamphlets are on display</p> <p>7 in your store, right?</p> <p>8 A Yes.</p> <p>9 Q And you will continue to be able to say</p> <p>10 what you want about any topic that you wish to speak</p> <p>11 about with your customers before or during or after you</p> <p>12 distribute the pamphlets to them?</p> <p>13 A Yes.</p> <p>14 Q So there's nothing you will not be able to</p> <p>15 say to your customers at the point of sale in your</p> <p>16 store or at any other location in your store because of</p> <p>17 the display or distribution of the pamphlets, right?</p> <p>18 A Correct.</p> <p>19 Q Let's look again at the document marked</p> <p>20 Exhibit 5. I see you have it in front of you. This is</p> <p>21 the firearms and suicide prevention pamphlet and the</p>	<p style="text-align: right;">Page 92</p> <p>1 A It does not.</p> <p>2 Q Is it your understanding that you are</p> <p>3 required by the ordinance to put your name on this</p> <p>4 pamphlet?</p> <p>5 A No.</p> <p>6 Q So there's no risk that your customers will</p> <p>7 think this pamphlet was written by you, right?</p> <p>8 MR. PENNAK: Calls for speculation on the</p> <p>9 part of the witness.</p> <p>10 THE WITNESS: It could.</p> <p>11 BY MS. SUDARSAN:</p> <p>12 Q How could they?</p> <p>13 A Just because it doesn't have Cindy's Hot</p> <p>14 Shots on it doesn't mean we didn't write it.</p> <p>15 Q You could say to your customers I didn't</p> <p>16 write this, right?</p> <p>17 A We could.</p> <p>18 Q Let's look at the other pamphlet that was</p> <p>19 included in the document marked Exhibit 5 that says do</p> <p>20 you have unresolved conflicts at the top.</p> <p>21 A Yes.</p>
<p style="text-align: right;">Page 91</p> <p>1 pamphlet identifies its authors on the front cover, the</p> <p>2 National Shooting Sports Foundation and the American</p> <p>3 Foundation for Suicide Prevention, right?</p> <p>4 A Yes.</p> <p>5 Q And it does so on its back cover as well,</p> <p>6 right, the page that says resources?</p> <p>7 A Yes.</p> <p>8 Q Your customers will know that you did not</p> <p>9 write this pamphlet, right?</p> <p>10 MR. PENNAK: Calls for speculation on the</p> <p>11 part of the witness.</p> <p>12 THE WITNESS: Possibly.</p> <p>13 BY MS. SUDARSAN:</p> <p>14 Q This pamphlet doesn't say Cindy's Hot Shots</p> <p>15 on the cover, does it?</p> <p>16 A It does not.</p> <p>17 Q Does it say Cindy's Hot Shots on the back</p> <p>18 cover?</p> <p>19 A It does not.</p> <p>20 Q Does it say it on any of the pages of the</p> <p>21 pamphlet?</p>	<p style="text-align: right;">Page 93</p> <p>1 Q And this pamphlet includes the logo of the</p> <p>2 Anne Arundel County Department of Health, right?</p> <p>3 A Yes.</p> <p>4 Q So your customers will know you did not</p> <p>5 write this pamphlet, right?</p> <p>6 MR. PENNAK: Calls for speculation on the</p> <p>7 part of the witness.</p> <p>8 THE WITNESS: It could.</p> <p>9 BY MS. SUDARSAN:</p> <p>10 Q And you could tell your customers I did not</p> <p>11 write this pamphlet, right?</p> <p>12 A I could.</p> <p>13 Q And then your customers would know that you</p> <p>14 didn't write this pamphlet?</p> <p>15 MR. PENNAK: Calls for speculation on the</p> <p>16 part of the witness.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MS. SUDARSAN:</p> <p>19 Q You can also tell your customers that you</p> <p>20 don't endorse the pamphlets, right?</p> <p>21 A I could.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q You could say to your customers I'm 2 required by county ordinance to give you this even 3 though I don't think I should have to, right? 4 A I could. 5 Q When customers buy firearms, how do you 6 give those firearms to them, in what container? 7 A It's going to depend on the situation. If 8 it's brand new gun, typically it's going to come with a 9 box or a case or something like that. If it's used, 10 they may not. 11 Q And how do you package ammunition when your 12 customers buy it? 13 A In a box. 14 Q So you could just slip these two pamphlets 15 into the box containing the firearms or ammunition that 16 your customers have purchased, right? 17 A We could. 18 Q Is there something you think you will be 19 forced to say once the pamphlets are visible and 20 available to your customers even though as you said, 21 you could tell them you did not prepare either of the</p>	<p style="text-align: right;">Page 96</p> <p>1 Q Yes. 2 A Retail is 1,500 square feet. 3 Q And is the store all in one room or are 4 there multiple rooms? 5 A There's multiple sections to the room, but 6 they're not blocked off by anything. 7 Q So it is one room with four walls? 8 A Yes. 9 Q What are the sections blocked off with? 10 A Displays. 11 Q These displays are not floor to ceiling? 12 A Correct. 13 Q How many counters are in this room? 14 A Three sides about 15 different cases. 15 Q On each side or total? 16 A Total. 17 Q Total there are 15 cases? 18 A Yes. 19 Q And where do transactions involving 20 firearms and ammunitions occur in the room? 21 A Both on the retail and the range side. So</p>
<p style="text-align: right;">Page 95</p> <p>1 pamphlets? 2 A Verbally, no. 3 Q What would you say to them nonverbally? 4 A To be forced to say everything in the back 5 nonverbally. 6 Q But that is not something you need to read 7 aloud to your customers, right? 8 A No. 9 Q And you can say I didn't write this. I 10 don't think I should have to give it to you and that 11 could be the end of the conversation with your 12 customers, right? 13 MR. PENNAK: Objection, asked and answered. 14 THE WITNESS: I prefer to not even have to 15 do that. 16 BY MS. SUDARSAN: 17 Q But you could say that? 18 A I could. 19 Q How big is Cindy's Hot Shots, the retail 20 portion of the store? 21 A Physically?</p>	<p style="text-align: right;">Page 97</p> <p>1 on both sides. 2 Q Is the range side in this one room or is 3 that a separate room? 4 A It is the same room. 5 Q Is the -- when you say the range side, what 6 do you mean? 7 A The range counter. 8 Q This is a counter where you sign in people 9 who want to use your firing range? 10 A Yes. 11 Q And you also do sales involving firearms 12 and ammunition at that same counter? 13 A Occasionally, yes. 14 Q How many different points of sale do you 15 have? This might be denoted with a cash register. 16 A Six different cash registers. 17 Q In this one room? 18 A Yes. 19 Q And you said you have 15 cases that 20 comprise the three -- 21 A Yes.</p>

<p style="text-align: right;">Page 114</p> <p>1 views on gun safety and all of the customers who you've</p> <p>2 spoken with about gun safety think it is beneficial and</p> <p>3 your testimony is that you don't know what any of your</p> <p>4 customers think about suicide prevention, mental health</p> <p>5 and conflict resolution?</p> <p>6 MR. PENNAK: Mischaracterizes his</p> <p>7 testimony.</p> <p>8 MS. SUDARSAN: Mr. Pennak, if you could</p> <p>9 please wait for me to finish my question before you</p> <p>10 lodge your objection.</p> <p>11 MR. PENNAK: I thought you were finished.</p> <p>12 MS. SUDARSAN: You just interrupted me</p> <p>13 again. I'm going to please ask that you stop</p> <p>14 interrupting me.</p> <p>15 MR. PENNAK: I apologize for interrupting</p> <p>16 you. I thought you were the finished.</p> <p>17 BY MS. SUDARSAN:</p> <p>18 Q You can answer.</p> <p>19 MR. PENNAK: Same objection.</p> <p>20 THE WITNESS: What was the question?</p> <p>21 MS. SUDARSAN: Do you mind please reading</p>	<p style="text-align: right;">Page 116</p> <p>1 A I'm not sure.</p> <p>2 Q What specific things will your customers</p> <p>3 not be able to say?</p> <p>4 MR. PENNAK: Calls for speculation.</p> <p>5 THE WITNESS: I'm not sure.</p> <p>6 BY MS. SUDARSAN:</p> <p>7 Q Have any customers told you that they would</p> <p>8 be less willing to share their views with you because</p> <p>9 of the pamphlets?</p> <p>10 A No one has said that, no.</p> <p>11 Q Sitting here today, you cannot identify any</p> <p>12 speech your customers will be unable to make because of</p> <p>13 the display or distribution of the pamphlets?</p> <p>14 A No.</p> <p>15 Q In your complaint, you allege that</p> <p>16 customers who will be the recipients of such official</p> <p>17 communications from the county will objectively be less</p> <p>18 willing to articulate their own views relating to gun</p> <p>19 safety, gun training, suicide prevention, mental health</p> <p>20 and conflict resolution. What was the basis of that</p> <p>21 allegation in your complaint?</p>
<p style="text-align: right;">Page 115</p> <p>1 the question?</p> <p>2 (Reporter read back the record as requested.)</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. SUDARSAN:</p> <p>5 Q You don't know your customers' views on</p> <p>6 suicide prevention, mental health and conflict</p> <p>7 resolution because your customers don't talk to you</p> <p>8 about these issues?</p> <p>9 A Yes.</p> <p>10 Q So you can only speculate as to what views</p> <p>11 your customers have on these topics?</p> <p>12 MR. PENNAK: Argumentative.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MS. SUDARSAN:</p> <p>15 Q What speech will your customers be</p> <p>16 unwilling to engage in when the pamphlets are visible</p> <p>17 and available in your store?</p> <p>18 A I'm not sure.</p> <p>19 Q What speech will your customers be less</p> <p>20 willing to engage in when the pamphlets are visible and</p> <p>21 available in your store?</p>	<p style="text-align: right;">Page 117</p> <p>1 A What do you mean?</p> <p>2 Q You've testified that you don't know what</p> <p>3 your customers think about any of these topics and that</p> <p>4 they previously have never spoken to you about these</p> <p>5 topics.</p> <p>6 In your complaint, you allege that your</p> <p>7 customers who will receive the pamphlets will</p> <p>8 objectively be less willing to articulate their views</p> <p>9 on these topics. I'm asking what was the basis of that</p> <p>10 allegation. It sounds like you don't know what your</p> <p>11 customers think or are willing to talk about?</p> <p>12 MR. PENNAK: It's compound now. What's the</p> <p>13 question?</p> <p>14 BY MS. SUDARSAN:</p> <p>15 Q You can answer.</p> <p>16 A I know my customers and I know what they do</p> <p>17 and don't like. Just because I haven't spoken to them</p> <p>18 about very, very specific things, I do know what my</p> <p>19 customers do and don't like.</p> <p>20 Q How do you know what your customers do and</p> <p>21 don't like?</p>

<p style="text-align: right;">Page 118</p> <p>1 A I spend a lot of time with them.</p> <p>2 Q Despite never talking to them about their</p> <p>3 views on any of the subjects that you raise in your</p> <p>4 complaint, you know what they would be less willing to</p> <p>5 articulate?</p> <p>6 A Yes.</p> <p>7 Q How do you know that?</p> <p>8 A I just do.</p> <p>9 Q Is that a guess?</p> <p>10 A Educated guess.</p> <p>11 Q What -- describe to me your education in</p> <p>12 this area.</p> <p>13 A Having dealt with my customers for the past</p> <p>14 three years, I can -- I can tell you based on other --</p> <p>15 I know what my customers like.</p> <p>16 Q But you didn't talk to any of your</p> <p>17 customers before you made this allegation in your</p> <p>18 complaint?</p> <p>19 A No.</p> <p>20 Q And all of your customers have the same</p> <p>21 views on gun safety, gun training, suicide prevention,</p>	<p style="text-align: right;">Page 120</p> <p>1 Q Have they indirectly told you that?</p> <p>2 A No.</p> <p>3 Q So no customers have told you that they</p> <p>4 will not be able to purchase firearms or ammunition</p> <p>5 from you because of the pamphlets?</p> <p>6 A No.</p> <p>7 Q Have any customers or did any customers</p> <p>8 when you had the pamphlets displayed refuse to purchase</p> <p>9 firearms or ammunition from you?</p> <p>10 A None that were in the store that day, no.</p> <p>11 Q Did some customers who were not in the</p> <p>12 store that day refuse to buy firearms and ammunition</p> <p>13 from you?</p> <p>14 A No. Not to my knowledge, no.</p> <p>15 Q Do your customers know that you are</p> <p>16 participating in this lawsuit?</p> <p>17 A Some may.</p> <p>18 Q Have you talked to your customers about the</p> <p>19 lawsuit?</p> <p>20 A I don't believe so, no.</p> <p>21 Q Some may know about it from other employees</p>
<p style="text-align: right;">Page 119</p> <p>1 mental health and conflict resolution?</p> <p>2 A Absolutely not.</p> <p>3 Q So some of your customers might agree with</p> <p>4 the pamphlets, right?</p> <p>5 A It's possible.</p> <p>6 Q And those customers might be more willing</p> <p>7 to articulate their views relating to gun safety, gun</p> <p>8 training, suicide prevention, mental health and</p> <p>9 conflict resolution when they are the recipients of</p> <p>10 such official communications from the county, right?</p> <p>11 MR. PENNAK: Calls for speculation on the</p> <p>12 part of the witness.</p> <p>13 THE WITNESS: I'm not sure.</p> <p>14 BY MS. SUDARSAN:</p> <p>15 Q But it's possible, right?</p> <p>16 A I'm not sure.</p> <p>17 Q Have any customers told you that they will</p> <p>18 not be able to purchase firearms or ammunition from you</p> <p>19 because of the display and distribution of the</p> <p>20 pamphlets?</p> <p>21 A Not directly, no.</p>	<p style="text-align: right;">Page 121</p> <p>1 at Cindy's Hot Shots?</p> <p>2 A Possibly.</p> <p>3 Q Do you know what your customers' reaction</p> <p>4 has been to Cindy's Hot Shots' participation in this</p> <p>5 lawsuit?</p> <p>6 A I'm not sure.</p> <p>7 Q Did you ask any customers to join this</p> <p>8 lawsuit?</p> <p>9 A No.</p> <p>10 MS. SUDARSAN: I think we'll take a short</p> <p>11 break, but then we might be done or close to.</p> <p>12 (There was a brief recess taken.)</p> <p>13 BY MS. SUDARSAN:</p> <p>14 Q Mr. Quick, we're back on the record.</p> <p>15 A Yes.</p> <p>16 Q You understand that you are still under</p> <p>17 oath?</p> <p>18 A Yes.</p> <p>19 MS. SUDARSAN: Let the record reflect that</p> <p>20 counsel for the witness during the break informed</p> <p>21 counsel for defendant that there was a conversation</p>